

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**BENITO GAUNA,
PLAINTIFF**

V.

**ALAMO PM, LLC AND
TONY YRAGUEN,
DEFENDANTS**

§
§
§
§
§
§
§
§
§

CASE NO. 5:23-cv-744-XR

SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWER

Defendants Alamo PM, LLC and Tony Yraguen respectfully file this Second Unopposed Motion for Extension of Time to File Answer and show:

1. Defendants' Answer was originally due September 20, 2023.
2. The parties agreed to an Answer extension to October 18, 2023 so they could exchange documents to determine if early resolution was possible.
3. Settlement discussions are ongoing, and the parties believe an additional two-week extension to the Answer deadline is appropriate to aid in these discussions.
4. Defendants request that their answer deadline be extended to November 1, 2023.
5. Counsel for plaintiff does not oppose this request.
6. This motion is sought not for delay, but so that justice may be done.

Respectfully submitted,

/s/ Allison S. Hartry
ALLISON S. HARTRY
State Bar No. 24083149
LAWRENCE MORALES II
State Bar No. 24051077
THE MORALES FIRM, P.C.
6243 IH-10 West, Suite 132
San Antonio, Texas 78201
Telephone No. (210) 225-0811
Facsimile No. (210) 225-0821
lawrence@themoralesfirm.com
ahartry@themoralesfirm.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with counsel for Plaintiff regarding the relief requested in his motion and that Plaintiff is unopposed to the requested extension.

/s/ Allison S. Hartry
Allison S. Hartry

CERTIFICATE OF SERVICE

I hereby certify that on this the 17th day of October 2023, I served this document on all opposing counsel through the Court's Electronic Filing System.

/s/ Allison S. Hartry
Allison S. Hartry